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Coach & **E**quipment Mfg. Corp.

Manufacturer of Quality Commercial Buses

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NHTSA-03-14245-8

March 28, 2003

Administrator
National Highway Traffic Safety Administration
400 Seventh Street SW
Washington, DC 20590

re: Petition for reconsideration: CFR Part 773 et. al.
Reporting of Information and Documents About Potential Defects.

Dear Sir:

Coach & Equipment Manufacturing Corp. builds bus bodies onto purchased chassis (Ford, GM, and International). We have been in business for over 50 years, and will build about 825 buses this year, up from 706 last year, 620 the year before, and fewer than 500 in previous years. I am struggling to prepare our company for reporting under this regulation, and am doing it myself because we are such a small company.

You define "small business" as having fewer than 1000 employees and seem to equate that to 500 or fewer buses per year. I realize that if the government were building buses it might take 1000 employees to build 500 buses. We will build more than 800 buses this year with a total employment of 112, or more than 10 times greater productivity than you seem to assume. We have 1 receptionist, no secretaries or administrative assistants, 2 people in parts and service, 2 in engineering, 2 in purchasing, one production planner, 2 people in accounting, 2 in senior management, and everyone else is building a bus or handling materials. This is how lean modern companies have to be to stay competitive. Excluding the reception area, we have only 7 office rooms in our whole building, all but three shared. There is no staff to do this data collection and reporting work.

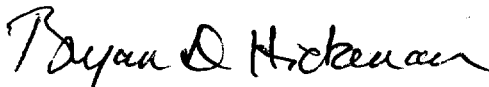
I request that you raise the exemption on reporting to builders of 5000 or more vehicles if you are serious about not burdening small companies like ours. We earn way less than \$1000 per bus. Our people work for far less money than do government workers, work 50 years until they are in their late 60's and have no pensions. That is the reality of life out in the sticks. There is no spare money for a massive reporting system to catalog every complaint and warranty repair and report it to you. Moreover, it is Ford, GM or International that build the chassis and provide all the items that tend to be related to vehicle safety: brakes, fuel systems, steering, tires, engines, drive trains, suspensions, and the like. They warrant the chassis and our customers go to a Ford or GM dealer for repairs, not to us. Ford inspects our factory to be sure we follow their QVM rules for putting the bus body onto the chassis. Whatever you imagine "bus manufacturing" to be is probably exaggerated from the reality. We are essentially a dinky little metal fab shop, but we do build very safe buses with welded steel roll structures. I do not know of any deaths in our buses in the years I have been with the company. Our defects tend to be stupid little things like a wavy paint job, a bump in the floor rubber, a leak in the door seal, or a complaint about a purchased item, such as a torn seat cover or a noisy fan in the air conditioner. For us to report all this to the federal government seems ludicrous.

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I don't know if it is too late for you to reconsider, but I certainly hope that you do. I do not think that anything we report will help you make the roads safer for Americans -- Ford, GM and other chassis manufacturers will give you the information you need for that. Of course, we agree that we should report deaths and injuries, and we have no problem complying with this part of the regulations. But if I report every little complaint, not only will it be burdensome, my competitors may get hold of the numbers through the freedom of information act and make my customers think we build bad buses. So I will have to waste time getting the numbers on all my competitors so I can make them look bad too. If they are not as honest in their reporting, they will look better than we are, even if that is not true. We send out a customer satisfaction survey to our customers to find out how they like things. Should I discontinue this just so I don't have to report the results to you? If I don't ask for customer feedback, how do I improve my product? 9 out of 10 unhappy customers never tell you unless you ask them. Problems don't get fixed unless we proactively seek them out. Your reporting creates some rather perverse incentives. Please reconsider.

Best regards,

A handwritten signature in cursive script, reading "Bryan D. Hickman".

Bryan D. Hickman
President

cc: Docket Management
Room PL-401
400 Seventh Street SW
Washington, DC 20590